

February 3, 2006

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: EB Docket No. 06-36 and EB-06-TC-060, Certification of CPNI Filing, February 3, 2006, for Yucca Telecommunications Systems, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Yucca Telecommunications Systems, Inc.(499 Filer ID No. 820644) in response to the Public Notices issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006, and February 2, 2006. The Enforcement Bureau has requested the compliance certificate as required by 47 C.F.R. §64.2009(e).

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Cecile Archibeque".

Cecile Archibeque  
Assistant General Manager – Yucca Telecommunications Systems, Inc.

cc: Byron McCoy, [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

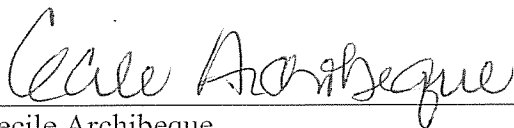
**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>CPNI Compliance Certification</b>	<b>§</b>	<b>EB Docket No. 06-36 and EB-06-TC-060</b>
<b>As Required by FCC Enforcement</b>	<b>§</b>	<b>Yucca Telecommunications Systems, Inc.</b>
<b>Bureau, DA 06-223 and DA 06-258</b>	<b>§</b>	<b>499 Filer ID No. 803292</b>

**YUCCA TELECOMMUNICATIONS SYSTEMS, INC.  
CERTIFICATION OF CPNI FILING (February 3, 2006)**

1. Yucca Telecommunications Systems, Inc. ("Yucca" or "Company") (499 Filer ID No. 820644) is submitting this Compliance Certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223) and February 2, 2006 (DA 06-258), pursuant to 47 C.F.R. §64.2009(e).
2. As of the date of this certification, Yucca has not used CPNI for marketing purposes. Although Yucca has not used CPNI for marketing purposes, it has established the appropriate safeguards and protections to ensure compliance with the FCC's rules pursuant to the proper treatment of CPNI data. These safeguards include documentation of the Company's CPNI Compliance Procedures in its Operating Practices and specific training of the Company's personnel with regard to compliance with the maintenance, use, protection and safeguarding of CPNI data.
3. This certification is signed below by an officer of Yucca Telecommunications Systems, Inc. who has personal knowledge that Yucca has established procedures that are adequate to ensure compliance with the CPNI rules currently in effect and the statements contained in this filing are true and correct.

s/Via ECFS on 2/3/06; Original on file at Company

  
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Cecile Archibeque

Assistant General Manager, Yucca Telecommunications Systems, Inc.

**Statement of Customer Proprietary Network Information (CPNI)  
Compliance Procedures for  
Yucca Telecommunications Systems, Inc.**

Yucca Telecommunications Systems, Inc. ("Yucca") complies with all CPNI regulations as contained in Section 222 of the Communications Act of 1934. This includes complying with the following CPNI safeguards:

**Sec. 64.2009 Safeguards required for use of CPNI.**

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

*Customers who request that Yucca not use CPNI will have a prominent notation on their customer record so that employees can clearly see their CPNI status. An electronic and paper list will also be kept updated.*

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

*Yucca personnel have received an in-depth training on CPNI rules and restrictions. New employees are trained on CPNI as part of their orientation. Disciplinary processes for employees not following CPNI rules follow Yucca's established disciplinary procedures.*

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

*To date, Yucca has not used CPNI. If and when Yucca uses CPNI for marketing purposes, this safeguard will be followed. Yucca does not disclose CPNI information to third parties.*

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

*To date, Yucca has not used CPNI for outbound marketing programs or campaigns. If and when Yucca uses CPNI for marketing purposes, this safeguard will be followed. An Yucca supervisor has been identified for this responsibility and Yucca sales personnel are trained to follow this supervisory approval process prior to use of CPNI.*

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

*This safeguard has been met and Yucca's compliance certificate and this statement of compliance procedures are on file in our office per the CPNI rules.*